PATENT 450100-02402

REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS.

Claims 1-6 and 8-17 are pending. Claims 1, 8 and 13 are independent. Claims 1-6, 8, 9 and 11-17 are hereby amended. No new matter has been introduced. Claim 18 has been canceled without prejudice or disclaimer of any subject matter. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

Claims 1-6 and 8-18 were rejected under 35 U.S.C. §112, second paragraph, as allegedly indefinite. Claims 1, 8 and 13 have been amended, thereby obviating the rejection.

II. REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 1, 6 and 13 were rejected under 35 U.S.C. §103(a) as being unpatentable over Bruce Schneier's <u>Applied Cryptography</u> (hereinafter referred to as "Schneier") in view of EP 0 851 627 to Hino, et al. (hereinafter, merely "Hino") and further in view of U.S. Patent No. 5,237,460 to Miller, et al. (hereinafter, merely "Miller").

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Claims 2, 3, 14, 15 and 18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Hino and Miller and further in view of U.S. Patent No. 5,241,599 to Bellovin, et al. (hereinafter, merely "Bellovin").

Claims 4 and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Hino, Miller and Bellovin, and further in view of U.S. Patent 6,385,727 to Cassagnol, et al. (hereinafter, merely "Casagnol").

Claims 5 and 17 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Hino, Miller, Bellovin and Cassagnol and further in view of U.S. Patent 6,202,152 to Yuenyongsgool, et al. (hereinafter, merely "Yuenyongsgool").

Claim 8 was rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Hino and Miller and further in view of U.S. Patent 5,594,793 to Bahout (hereinafter, merely "Bahout").

Claims 9 and 10 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Hino, Miller and Bahout and further in view of Bellovin.

Claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Hino, Miller, Bahout and Bellovin and further in view of Cassagnol.

Claim 12 was rejected under 35 U.S.C. §103(a) as being unpatentable over Schneier in view of Hino, Miller, Bahout, Bellovin and Cassagnol and further in view of Yuenyongsgool.

III. RESPONSE TO REJECTIONS

Claim 1 recites, inter alia:

"An audio/video data processing apparatus comprising:...

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processing means for compressing audio/video data in units of a compression block having a first data length;

encrypting means for encrypting the compressed data in units of an encryption block having a second data length,

wherein the first data length is a data length of an integral multiple of the second data length;

control means for writing the encrypted data in said storage means so that the data positioned in the same encryption block is also positioned in the same compression block, said control means reading the data from said storage means in units of the compression block." (Emphasis added)

As understood by Applicants, Schneier relates to an algorithm which encrypts data in 64-bit blocks. A 64-bit block of plaintext goes in one end of the algorithm and a 64-bit block of ciphertext comes out the other end. The same algorithm and key are used for both encryption and decryption.

As understood by Applicants, Hino relates to compression and encryption of data and to a data compression/encryption method and system to enhance the processing efficiency while reducing power consumption in performing compression processing as well as encryption processing on data.

As understood by Applicants, Miller relates to a random-access type storage device such as a hard disk or semiconductor memory which is formatted to provide multiple partitions of varying block size. The data to be stored is in blocks of fixed size, and these blocks are compressed if the compressed size fits in the block size of a small-block partition in the storage device. If a data block is not compressible to the small block size, it is stored uncompressed in another of the partitions. The memory device also contains a table storing the locations of the blocks in the partitions, so upon recall the block is retrieved from location, decompressed (if it had been compressed), and sent to the CPU.

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As understood by Applicants, Bahout relates to an integrated circuit which has an EEPROM type memory and a lock (L) protecting the zone of the memory. The memory contains a read-protected password (PW) and the circuit has means to release the lock (L) if the circuit receives a write command at the address of the password of the same encrypted password (PW).

Applicants submit that the combination of references does not disclose or suggest the above-identified features of claim 1. Therefore, Applicants submit that independent claim 1 is patentable.

For reasons similar to, or somewhat similar to, those described above with regard to independent claim 1, independent claims 8 and 13 are also believed to be patentable.

IV. DEPENDENT CLAIMS

The other claims are dependent from one of the independent claims, discussed above, and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference or references, providing the basis for a contrary view.

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In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Respectfully submitted,

FROMMER LAWRENCE & HAUG LLP Attorneys for Applicants

Thomas F. Presson

Reg. No. 41,442 (212) 588-0800